



and will supplement this Discovery Plan accordingly.

(c) The parties agree that claims of privilege or of protection as trial preparation material, including procedures to assert said claims after production, will be governed by the procedures outlined in Rule 26(b)(5) of the FEDERAL RULES OF CIVIL PROCEDURE.

(d) Dates for commencing and completing discovery, including discovery to be commenced or completed before other discovery is as follows:

COMPLETING ALL DISCOVERY AS FOLLOWS: **September 4, 2024**

WRITTEN DISCOVERY: **August 5, 2024**

FACT DISCOVERY DEPOSITIONS: **September 4, 2024**

EXPERT DISCLOSURES (Rule 26):

(i) Plaintiff's Rule 26 Experts: **July 5, 2024**

(ii) Defendants' Rule 26 Experts: **August 5, 2024**

(iii) Supplementation under Rule 26: **September 4, 2024**

EXPERT WITNESS DEPOSITIONS: **September 4, 2024**

(e) Maximum number of interrogatories by each party to another party shall not exceed 25 with response to said interrogatories being due 30 days after service of same.

(f) The maximum number of requests for admissions by each party to another party shall not exceed 25 with responses to said request for admissions being due 30 days after service of same.

(g) The maximum number of depositions for each party not including Rule 26 designated Experts shall be 15, unless additional depositions are agreed to in writing by the parties.

(h) The length of any individual deposition shall not exceed 7 hours in deposition time unless an extension is agreed to in writing by the parties.

4. **Other Items:**

- (a) Final dates for parties to amend pleadings or join parties: **January 8, 2024**
- (b) Final dates to file dispositive motions: **October 4, 2024**
- (c) State the prospects for settlement: At the conclusion of discovery.
- (d) Identify any alternative dispute resolution procedure that may enhance settlement prospects: The parties will participate in the court required ADR by **February 1, 2024**.
- (e) Final dates for submitting Rule 26(a)(3) witness lists, designations of witnesses whose testimony will be presented by deposition and exhibit lists:
  - (i) Plaintiff: To be done in accordance with the trial judge's notice of trial setting.
  - (ii) Defendants: To be done in accordance with the trial judge's notice of trial setting.
- (f) Final dates to file objections under Rule 26(a)(3):
  - (i) Plaintiff: To be done in accordance with the trial judge's notice of trial setting.
  - (ii) Defendants: To be done in accordance with the trial judge's notice of trial setting.
- (g) Suggested trial date and estimate of trial length:
  - (i) Suggested Trial Date: At the convenience of the Court.
  - (ii) Estimated Trial Length: 4-5 days

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document was served via US District Court ECF system upon:

Heather Moore Collins  
Ashley Shoemaker Walter  
Caroline Drinnon  
HMC Civil Rights Law, PLLC  
7000 Executive Center Dr., Ste. 320  
Brentwood, TN 37027

on or before the filing date thereof.

DATE: This the 26<sup>th</sup> day of October, 2023.

By: s/Nathan D. Tilly  
Nathan D. Tilly